

### ATTACHMENT - REMARKS

By this Amendment, independent claims 1 and 34 have been amended for clarity and to better define the invention. It is submitted that the present application is in condition for allowance for the following reasons.

In the outstanding Office Action, a **restriction** was required between three groups of claims as noted. In response to the restriction requirement, Applicant hereby elects for examination: Group I, encompassing claims 1-31 drawn to a mould for preparing a wind turbine blade.

However, this restriction requirement is **traversed** for the following reasons.

In support of this restriction requirement in a national stage application, the examiner asserted that there is no common inventive concept among the noted three groups because the examiner identified special technical feature common to all groups is known in the prior art. In particular, the examiner cited WO 99/07532 to support this assertion.

WO 99/07532 describes a composite tool with a metal surface presumably for vacuum forming. On page 4 and in fig. 3 there is described that a metal plate or sheet 10 formed in the desired shape, treated and backed by an (airtight) casting resin 16 (for supporting cooling tubes/pipes) which in turn is backed by a porous layer 18, which latter constitutes the mould support structure. The porous layer 18 is surrounded by an impervious covering 24. The support structure 18 is, in contrast to the present invention, part of the air drainage system.

The present application (the following references are to page/lines), according to 5/19-6/7, conversely relates to a (unsealed) support structure 4 with a substantially

airtight surface and an air drainage system 6 underneath the tool surface member 8 secured to the support structure 4 by means of fasteners, by an adhesive or by chemical bonding (see 5/31-6/7) being substantially airtight in between. In 10/7-16 it is shown that the air-drainage system 6 is intended to be airtight in the mould except towards the air-permeable surface member 8 and to a pressure control system. The pressure control system is discussed in detail in 10/18-27. This clearly indicates that the main members of the mould in the present invention are complementary separate but inter-related items, which will be referred to in the following.

A feature distinguishing the invention from the prior art is the separation of the elements of the mould in complimentary layers 4, 6 and 8, and by making the surface of the support structure substantially airtight. Flexibility in design of the air-drainage layer is advantageous, as also pointed out in the description at 8/21-24. The air-drainage system 6 between the mould surface and backed by the airtight mould support structure, as shown in Figs. 1, 3,4, 5 and 6, can be tailored to individual needs while still maintaining the single general inventive concept of a clear definition of the scope of each of the mould elements.

As observed in WO 99/07532, the main body or support structures are of a porous nature. These are thus part of an air-drainage system which is opposite in nature to that of the present invention. In the present invention, the air-drainage system is not a part of the support structure, which structure is airtight at least at the borderline to the air-drainage system; though for some embodiments, the air-drainage system could be integrated into the surface of the support structure airtight bordering the body of the support structure. As described in 5/19-24 of the present application, the support

structure need not be solid, but it still has an airtight boundary surface, since the body of the support structure is not a part of the air-drainage system.

In order to emphasize these essential features as discussed above, independent claims 1 and 34 have been amended accordingly. Support for the amendments to claims 1 and 34, respectively, can be found in the following locations.

1. 5/23-24: where it is stated that "in a preferred embodiment, the support structure forms an entire surface, which is substantial airtight".
2. 6/10-17: where it is stated that "in case of air leakage through the support structure" which supports that the air drainage system is airtight towards the support structure.
3. 10/7-9: where it is stated that "The air-drainage system (6) is intended to be airtight in the mould except towards the air-permeable surface member (8) and one or more openings to a pressure control system"; which is explained in more detail at 10/10-13.
4. 11/1-5: where it is stated that the air-drainage system is airtight towards the support structure.

In conclusion, it is submitted that special technical features link the apparatus and methods claims at least as follows, which features establish a common inventive feature which distinguishes over the prior art.

Claim 32. It will be appreciated that this claim concerns a method of manufacturing a mould according to the invention, wherein particular methods for generation of embodiments of the air-drainage system are claimed and with a dependency from amended independent claim 1. The description of one of the embodiments in

question is discussed in 10/29-34, figs. 5B and 5C; and another embodiment is described in 9/9-15 and shown in fig. 2 and fig. 3.

Claim 33. It will be appreciated that this claim concerns a method of manufacturing a mould according to the invention, wherein particular methods for generation of embodiments of the air-permeable surface member are claimed and with a dependency from amended independent claim 1. The description of one of the embodiments in question is stated in 13/31+ and in more detail in 15/25-16/10.

Claim 34. It will be appreciated that this amended independent claim concerns a method of manufacturing a mould according to the invention, wherein the two mould members, the air-permeable surface member 8 and the air-drainage system 6 are provided on an individual basis.

Claim 35. It will be appreciated that this claim dependent on amended independent claim 34 concerns a method of manufacturing a mould according to the invention, wherein the air-permeable surface member 8 and the air-drainage system 6 are provided as a subassembly, which subassembly is described in 19/5-20/10.

Claims 37-39. These method claims all are dependent on amended independent claim 1.

Claim 35. This use claim is dependent on amended independent claim 1.

Claim 40. This independent use claim recites the air-permeable surface member feature as discussed above.

Therefore, for all of the foregoing reasons, it is submitted that there is a unity of invention between all of the claims, so that all claims should now be examined.

It will also be noted that an (second) IDS is submitted concurrently herewith for the examiner's consideration.

Respectfully submitted,

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/Douglas E. Jackson/

Signed By                          Name: Douglas E. Jackson  
Attorney of Record                Registration No.: 28,518

**STITES & HARBISON PLLC** ♦ 1199 North Fairfax St. ♦ Suite 900 ♦ Alexandria, VA 22314  
TEL: 703-739-4900 ♦ FAX: 703-739-9577 ♦ CUSTOMER NO. 881